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09-15-06
03:03 PM

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Implement the Commission's Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emissions Standards into Procurement Policies.	)))))	R.06-04-009 (Filed April 13, 2006)

REPLY COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON THE DRAFT WORKSHOP REPORT

FRANK J. COOLEY
ANNETTE GILLIAM

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-4880
Facsimile: (626) 302-3990
E-mail:GILLIAA@sce.com

Dated: **September 15, 2006**

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE

STATE OF CALIFORNIA

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I.

INTRODUCTION

Pursuant to the Administrative Law Judge's Ruling on Phase 1 Post-Workshop Comments, Schedule, and Other Procedural Matters issued by Administrative Law Judge (ALJ) Meg Gottstein on July 7, 2006, and the extension of time granted by Acting Assistant Chief ALJ Janet Econome, dated August 28, 2006,[1] Southern California Edison Company (SCE) hereby submits its Reply Comments on the Draft Workshop Report (Reply Comments) issued by the California Public Utilities Commission (Commission) Staff.[2]

In the Workshop Report, Commission Staff outlines the background and purpose of the workshops, reviews participants' comments on key points, summarizes the advantages and disadvantages that participants attributed to key issues associated with an interim emissions

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1 PG&E requested an extension of time in an email dated August 25, 2006, on behalf of several parties. Acting Assistant Chief ALJ Econome extended the date for filing Opening Comments from September 1 to September 8, 2006, and for filing Reply Comments from September 12 to September 15, 2006.

2 On August 21, 2006, Commission Workshop Staff issued a Workshop Report entitled, "Draft Interim Emissions Performance Standard Program Framework" summarizing the three-day workshop conducted by the Commission in this climate change policy proceeding on June 21-23, 2006 in San Francisco.

performance standard (EPS) program,[3] and includes a revised version of the staff proposal for an EPS program (Revised Staff Proposal).

SCE received sixteen opening comments from twenty-three parties.[4] These opening comments summarize and collect the parties' positions taken at the workshop and opine on the Revised Staff Proposal in light of two bills recently passed by the California Legislature: Senate Bill (SB) 1368[5] and Assembly Bill (AB) 32.[6] In these Reply Comments, SCE will address certain issues identified by other parties in their opening comments.

In light of the varying comments by the parties on these issues, SCE reiterates its recommendation that the Commission hold another workshop for the parties to discuss the changes that are required in the Revised Staff Proposal due to SB 1368 and AB 32, as well as to choose an appropriate EPS in consultation with the California Energy Commission (CEC) and the California State Air Resources Board (CARB), if the Governor signs the bills.[7]

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[3] The EPS is designed to prevent backsliding before implementation of a greenhouse gas (GHG) cap that would apply to the three major investor-owned electric utilities (IOUs), jurisdictional energy service providers, and community choice aggregators that operate within an IOU's territory.

[4] The parties included: the Alliance for Retail Energy Markets; Calpine Corporation (Calpine); California Cogeneration Council; the Center for Energy and Economic Development; Carson Hydrogen Power Project LLC; Constellation NewEnergy, Inc., Constellation Energy Commodities Group, Inc., and Constellation Generation Group, LLC (collectively, Constellation); the Division of Ratepayer Advocates; the Energy Producers and Users Coalition and the Cogeneration Association of California; the Green Power Institute (GPI); the Independent Energy Producers Association; the Natural Resources Defense Council (NRDC), the Utility Reform Network (TURN), the Union of Concerned Scientists (UCS), and the Western Resource Advocates (WRA); PacifiCorp; Pacific Gas and Electric Company (PG&E); San Diego Gas & Electric company (SDG&E) and Southern California Gas Company (SCG); Sempra Global; and San Francisco Community Power.

[5] SB 1368, entitled Electricity: Emissions of Greenhouse Gases, was passed by the Assembly on August 30, 2006, was passed by the Senate on August 31, 2006, and was enrolled and sent to the Governor for signature on September 8, 2006.

[6] AB 32, entitled California Global Warming Solutions Act of 2006, was passed by the Senate on August 30, 2006, was passed by the Assembly on August 31, 2006, and was enrolled and sent to the Governor for signature on September 6, 2006.

[7] Under SB 1368, the Commission will set the standard for its jurisdictional LSEs, and the CEC will set the standard for local publicly owned electric utilities. Proposed new PUC Code Section 8341(a).

II.

DISCUSSION

A. The Commission Should Reject the Proposal of NRDC, TURN, UCS, and WRA to Subject IOUs' Utility Retained Generation (URG) Renovations to the EPS.

In their opening comments, NRDC, TURN, UCS, and WRA state:

> We support applying the standard to *all* new utility financial commitments of five years or longer, including utility-owned new generation, repowered facilities, and new and renewal contracts for power. We recommend that the Commission explicitly clarify in section 5a that the standard will also apply to major renovations of utility-owned facilities, as we recommended in our post-workshop comments. Major renovations fall under SB 1368's definition of a "long-term financial commitment" as "either a new ownership investment in baseload generation or a new or renewed contract with a term of five or more years."[8]

NRDC, TURN, UCS, and WRA are wrong. The term "long-term financial commitment" does not cover "major renovations" of URG facilities. SB 1368 defines "Long-term financial commitment" as:

> "Long-term financial commitment" means either a new ownership investment in baseload generation or a new or renewed contract with a term of five or more years, which includes procurement of baseload generation.[9]

The operative words of "either" and "or" in this definition indicate that two actions would constitute a "long-term financial commitment":

1. A new ownership investment in baseload generation; or

2. A new or renewed contract with a term of five or more years.

In the phrase, "new ownership investment," the word "new" modifies the word "ownership" not the word "investment." NRDC, TURN, UCS, and WRA apparently

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[8] Opening Comments of NRDC, TURN, UCS, and WRA at p. 11. Emphasis added.
[9] Proposed new Public Utilities Code section 8340(j).

misinterpret this provision. Their interpretation is wrong because no comma follows the word "new."

The rule on commas that separate two or more adjectives is explained in The Gregg Reference Manual.[10] According to the rule, a comma must separate two or more adjectives that modify the same noun. No comma follows "new," so "new" cannot modify the word "investment." It must modify the word "ownership."[11]

For an IOU to make a "long term financial commitment" under the definition provided by SB 1368, it must enter into an "investment in baseload generation" that is also a "new ownership" interest. An "investment in baseload generation" for an "existing ownership" interest does not satisfy the requirements of SB 1368 to be a "long term financial commitment." If an IOU renovates one of its own URG facilities, the ownership interest of the IOU remains the same. It is an "existing ownership" interest. It is not a "new ownership" interest. Therefore, renovation of an existing URG would not qualify as a "long term financial commitment."

Moreover, if an IOU renovates one of its own URG facilities, it does not enter into a "new or renewed contract with a term of five or more years." A contract requires two parties. If an IOU renovates its own URG, it does not enter into a "new or renewed contract" with another party for power from that facility.[12] It provides its own power to its own customers. Therefore,

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[10] Basic Rules for Commas That Separate
[¶]123 Use of a single comma:
c. To separate two or more adjectives that modify the same noun. (See also ¶¶168-171.)
"We need to mount an *exciting, hard-hitting* ad campaign."
The Gregg Reference Manual, A Manual of Style, Grammar, Usage, and Formatting, William A. Sabin, McGraw-Hill Irwin, 10th Ed., p. 16. Emphasis in original.

[11] The Gregg Reference Manual makes this clear in a discussion on multiple adjectives in Appendix A, entitled "Essays on the Nature of Style":

> For example, if I write about "a *long, hard* winter," I am actually referring to a winter *that will be long and hard;* so I need a comma … to establish the fact that *long* and *hard* modify *winter* independently. If I write about "a *long opening* paragraph," the word order makes it clear that *opening* modifies *paragraph* and that *long* modifies the two words together; so no punctuation is needed to establish the fact that I'm speaking about *"an opening paragraph that is long."*

Id. at p. 597. Italics in original; underlying added for emphasis.

[12] Any contract for the actual renovation services do not quality as the "new or renewed contract" referred to in SB 1368. Those contracts would be for renovation services—not for power from the facility.

the renovation of an IOU's URG would not be a "long term financial commitment" because of a "new or renewed contract."

For these reasons, renovation does not constitute a "long-term financial commitment" under the definition provided in SB 1368, because renovations are neither "new ownership" interests nor "new or renewed contracts." Consequently, the EPS should not apply to major renovations of URG facilities.

B. The Commission Should Reject the Proposal of Constellation to Subject IOUs' URG to the Gateway Screen Since it is Contrary to SB 1368.

In opening comments, Constellation proposes that the interim EPS provide a mechanism to ensure that URG is not exempt from the gateway screen.[13] Constellation argues:

> While Constellation continues to believe that the interim EPS should be restricted to new facilities only, if the Commission is indeed going to apply the interim EPS to all resource commitments that are of five years or greater duration with resources that operate in baseload fashion, the issues of whether and how the gateway will be applied to utility retained generation [citation omitted] must be specifically addressed.[14]

Constellation admits that URG facilities would not be subject to the interim EPS because they are not contractual commitments:

> Put simply, a decision to apply the interim EPS via contractual commitments only should not create a *de facto* loophole for all utility retained generation.[15]

Constellation readily admits that the Revised Staff Proposal would not apply to URG facilities:

> [U]nder the Revised Straw Proposal, utility retained generation would simply never trigger the gateway screen, because utility

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13 Comments of Constellation, p. 1.
14 Comments of Constellation, pp. 6-7.
15 Comments of Constellation, p. 7.

> retained generation does not enter into the type of contractual commitments that trigger the EPS review."[16]

Constellation offers no logical explanation of why IOUs' URG should be subjected to the EPS. It simply complains that:

> One could argue that the regulatory compact afforded to utility retained generation automatically should trigger the gateway screen review, and that is one potential solution to this issue – i.e., that all utility retained generation must be subject to the screen automatically upon implementation of the EPS, given that they enjoy a "regulatory contract" that is greater than 5 years in duration (unless, of course, it can be shown that the facility is not expected to be in operation pursuant to rate regulation for more than the next five years).[17]

Constellation proposes that the Commission amend the Workshop Report to provide a mechanism by which generation owned and operated by the IOUs will be subject to the gateway screen adopted in the interim EPS.[18]

SCE objects to Constellation's proposal. IOUs have invested millions of dollars in their URG facilities, which are needed to supply the electricity needs of California's consumers and for system reliability. Such facilities were built at a time when the regulatory scheme was quite different than today. Investment decisions were made based on different policies and different social conditions. To subject these already-built facilities to a standard that is being developed to prevent "backsliding" in decisions made for future investments during the interim period until a cap-and-trade program can be developed would accomplish nothing but possibly remove much-needed resources from those available to California consumers or raise rates to such consumers to pay for modifications to such facilities.

The Commission should reject Constellation's proposal to amend the Draft Workshop Report to include a mechanism to subject IOUs' URGs to the EPS gateway screen. This

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16 Comments of Constellation, p. 7.
17 Comments of Constellation, p. 7.
18 Comments of Constellation, p. 7.

proposal does not comply with the new provisions of SB 1368, as discussed in the previous section.

C. The Commission Should Reject the Proposal of NRDC, TURN, UCS, and WRA to Assign Unspecified Resource Contract the Emissions Level of a Conventional Pulverized Coal Generator.

In their opening comments, NRDC, TURN, UCS, and WRA express their concern that the Revised Staff Proposal's provision to apply the CEC "Net System Power" average emissions rate to unspecified resource contract would create "perverse incentives for LSEs to enroll in these contracts for periods of 5 years or greater."[19] To rectify their perceived "loophole," NRDC, TURN, UCS, and WRA recommend:

> To prevent contract loopholes and relieve administrative burdens and complexity, we strongly recommend the Commission assign unspecified resource contracts the emissions level of a conventional pulverized coal generator. As far as we are aware, no LSE has plans to sign long-term contracts for unspecified resource power in the future. Therefore, we see no reason why assigning long-term unspecified resource contracts an emissions value deemed not the pass the EPS would place undue burden on the LSEs.[20]

NRDC, TURN, UCS, and WRA apparently do not understand "unspecified resource contracts" and the manner in which IOUs use them. Energy contracts without an up-front specified source are common transactions in the energy market today. IOUs procure a variety of energy products using these types of contracts for a wide range of terms, ranging from a few months to several years. NRDC, TURN, UCS, and WRA are wrong in asserting that Load Serving Entities (LSEs) are not going to sign long-term unspecified resource contracts in the future and that, as a result, assigning such contracts an emissions value higher than the EPS would not place undue burden on the LSEs. Such assertions prove that these parties do not fully

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19 Opening Comments of NRDC, TURN, UCS, and WRA at p. 16.
20 Opening Comments of NRDC, TURN, UCS, and WRA at p. 16-17.

understand this type of transaction or its value to the ratepayers.[21] Their "strong recommendation" would essentially prevent any California IOU from ever signing a long-term contract for energy products *unless* the underlying source is specified and passes the EPS. In making such a suggestion, these parties are advocating that the ratepayers be denied a potentially attractive option to hedge energy price risk, out of a totally misguided fear that unspecified source contracts are a "loophole" to build high GHG emitting resources.

The Commission should understand that a seller who signs energy contracts without an up-front specified resource eventually will deliver such energy, if the buyer schedules it, either from specific sources or from market energy from other suppliers, who in turn will provide the energy from specified resources. To summarize, energy always will be produced and eventually will be supplied from existing physical resources, ranging from gas-fired CCGTs to out-of-state coal-fired plants, subject to the California Independent System Operator's import capacity allocations. Consequently, it is factually incorrect to always assume that an out-of-state pulverized-coal fired power plant will produce and deliver this energy.

California's electricity market has attracted a wide variety of market participants, some of whom do not own any resources. Instead, they use their financial and market expertise in offering a wide variety of energy and energy-related products to the LSEs. These sellers offer and enter into contracts with unspecified sources so that the seller may chose from which plant to deliver the power a short time before delivery. Thus, they maximize their profit between the then-existing market price and the contract price. In return, the buyer gets an upfront price that reduces risk. These contracts are not entered into in order to "game the system" or find "loopholes" as some suggest.

SCE agrees with NRDC, TURN, UCS, and WRA that the CEC "Net System Power" average should not be used to determine the emissions rate for unspecified resource contracts. Indeed, SCE believes that the Commission must choose a method of determining the emissions

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[21] In fact, the state of California relied heavily on such long-term unspecified resource contracts in order to alleviate the energy crisis of 2000-2001.

rate for unspecified resource contracts that better approximates the actual emissions of underlying resources at the time of delivery, rather than using the CEC methodology, which is based on unaccounted for energy in the California system. SB 1368 provides direction to the Commission on the manner in which it should establish a GHG EPS for unspecified sources:

> In developing and implementing the greenhouse gases emission performance standard, the commission shall address long-term purchases of electricity from unspecified sources in a manner consistent with this chapter.[22]

To apply the worst possible emissions level of a pulverized coal generator to unspecified resource contracts would not be consistent with the provisions added by SB 1368. More analysis and collaboration among the parties are needed to determine which methodology would be more consistent. SCE proposes that another workshop be convened to discuss this issue and others that have arisen by the passage of SB 1368 and AB 32, if and when the Governor signs the bills and they become law.

As explained earlier, the Commission should recognize that non-unit-specific contracts are an essential part of the hybrid market structure today and are critical in hedging the energy cost exposure to the IOUs' ratepayers. The Commission should not preclude non-unit-specific contracts from being an integral part of an IOU's portfolio.

D. The Commission Should Reject Calpine's Proposal to Require all Long-Term Commitments for Baseload Generation to Identify "Specified Resources" that Comply with the Interim EPS.

In its opening comments, Calpine urges the Commission to discourage policies that potentially increase long-term commitments with high emitting resources that are inconsistent with California's long-term environmental goals:

> Calpine recommends that the Draft Workshop Report be revised to require that all long-term commitments for baseload generation

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[22] SB 1368's proposed new PUC section 8341(d)(7).

> involve "specified resources" that can demonstrate compliance with the interim EPS.[23]

As SCE explained in response to NRDC, TURN, UCS, and WRA's proposal to assign unspecified resource contracts the emissions level of a conventional pulverized coal generator in Section II.C, unspecified resource contracts are common in the market today. Sellers offer such contracts to buyers. If the price is the least cost and the best fit for the LSEs requirements, then the LSE should enter into such contracts for a variety of different periods, based on the IOU portfolio requirements and their risk reduction plans. Calpine's self-serving proposal to rely only on specified resources would remove an attractive option to reduce energy price and energy delivery risk on behalf of California ratepayers.

Furthermore, SB 1368 requires that the Commission "address long-term purchases of electricity from unspecified sources in a manner consistent with this chapter."[24] The Commission should reject Calpine's proposed restriction because it conflicts with SB 1368 and because it is inconsistent with the realities of the electricity market in California today.

E. SCE Supports the Proposals of PG&E, SDG&E, SCG, and GPI to Set the EPS at a Minimum of 1,100 Lbs CO_2/MWh.

In its Opening Comments, SCE stated:

> SCE believes that the standard of 1,000 lbs CO_2/MWh is too low and could eliminate a significant amount of generation resources from being eligible to be procured by IOUs and other LSEs on a long-term basis. This number should be analyzed more fully in a workshop to discuss the redirection of this proceeding in light of SB 1368.[25]

In reviewing comments received from other parties, it became apparent that other parties believe that the standard of 1,000 lbs CO_2/MWh is too low and should be increased. In its opening Comments, PG&E states:

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[23] Comments of Calpine, p. 5.
[24] SB 1368's proposed new PUC section 8341(d)(7).
[25] Opening Comments of SCE, p. 8. Emphasis added.

> Based on this information and the need to maintain reliability with shaping, intermediate resources with efficient heat rates, PG&E supports the standard of 1,100 lbs CO2/MWh proposed by NRDC, TURN, UCS, GPI, and SDG&E, not 1,000 lbs CO2/MWH as recommended by the Draft Report. The 1,100 lb standard would prevent "backsliding" while at the same time taking into account intermediate units, including reciprocating engine units, that will be needed for reliable operation of the grid, including integration of renewables, and that may have emissions rates slightly above the average for CCGTs included in the "Spreadsheet of existing emissions rates" cited by the Draft Report in support of the 1,000 lb standard.[26]

In its opening Comments, SDG&E and SCG state:

> The main value of an interim EPS lies in the information supplied to generation developers. SDG&E and SoCalGas agree that a single standard, such as that proposed in the Revised Staff Proposal, provides an unambiguous standard and a clear signal to generation developers. SDG&E and SoCalGas submit, however, that the EPS should be at least 1,100 pounds of GHG per MWh so as to insure that all CCGTs will pass the EPS.[27]

In its opening Comments, GPI states:

> We are concerned, however, that the numerical standard that is selected is unnecessarily tight. The proposed value of 1,000 lb/MWh could exclude some legitimate CCGT generating facilities. In our opinion, this is not the purpose of the standard. The purpose of the standard is to avoid long-term commitments to generating resources with greenhouse gas emissions that are **higher** than the emissions from a natural gas-fired CCGT generator. The purpose of the EPS standard should not be to differentiate among different CCGT configurations, some of which might have higher heat rates in order to meet other (non-greenhouse gas) admirable environmental objectives, such as a facility with dry cooling technology for purposes of minimizing water use. As we stated in our *Post-Workshop Comments*, the interim EPS should be set at a level of 1,100 – 1,200 lbs/MWh, which will accommodate all of the kinds of generators that the rule is intended to permit, while excluding all of the types of generators that the rule is intended to avoid.[28]

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[26] Comments of PG&E, p. 12. Emphasis added.
[27] Comments of SDG&E and SCG, p. 3. Emphasis added.
[28] Comments of GPI, p. 6. Emphasis added.

SCE agrees with all of these statements and explicitly states its support for the proposals of PG&E, SDG&E, SCG, and GPI. The Commission should increase the standard to a minimum of 1,100 lbs CO2/MWh.

III.

CONCLUSION

SCE respectfully submits these Reply Comments on the Draft Workshop Report.

Respectfully submitted,

FRANK J. COOLEY
ANNETTE GILLIAM

/s/ ANNETTE GILLIAM
By: Annette Gilliam

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-4880
Facsimile: (626) 302-3990
E-mail:GILLIAA@sce.com

September 15, 2006

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commissioner's Rules of Practice and Procedure, I have this day served a true copy of REPLY COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON THE DRAFT WORKSHOP REPORT on all parties identified in the attached service list(s).

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this **15th day of September, 2006**, at Rosemead, California.

/s/ RAQUEL IPPOLITI
Raquel Ippoliti
Project Analyst
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Ave.
Post Office Box 800
Rosemead, California 91770

CASE ADMINISTRATION
CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE., RM. 370
ROSEMEAD, CA 91770
R.06-04-009

MICHAEL ALCANTAR
ATTORNEY AT LAW
ALCANTAR & KAHL LLP
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CA 94114
R.06-04-009

MAHLON ALDRIDGE
ECOLOGY ACTION, INC.
PO BOX 1188
SANTA CRUZ, CA 95060
R.06-04-009

JASMIN ANSAR
PG&E
PO BOX 770000
SAN FRANCISCO, CA 94177
R.06-04-009

E. JESUS ARREDONDO
DIRECTOR, REGULATORY AND
GOVERNMENTAL
NRG ENERGY, INC.
4600 CARLSBAD BLVD.
CARLSBAD, CA 99208
R.06-04-009

CURT BARRY
717 K STREET, SUITE 503
SACRAMENTO, CA 95814
R.06-04-009

R. THOMAS BEACH
CROSSBORDER ENERGY
2560 NINTH STREET, SUITE 213A
BERKELEY, CA 94710
R.06-04-009

C. SUSIE BERLIN
ATTORNEY AT LAW
MC CARTHY & BERLIN, LLP
100 PARK CENTER PLAZA, SUITE 501
SAN JOSE, CA 95113
R.06-04-009

CLARK BERNIER
RLW ANALYTICS
1055 BROADWAY, SUITE G
SONOMA, CA 95476
R.06-04-009

B.B. BLEVINS
EXECUTIVE DIRECTOR
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-39
SACRAMENTO, CA 95814
R.06-04-009

GREG BLUE
140 MOUNTAIN PKWY.
CLAYTON, CA 94517
R.06-04-009

KEVIN BOUDREAUX
CALPINE POWER AMERICA-CA, LLC
717 TEXAS AVENUE, SUITE 1000
HOUSTON, TX 77002
R.06-04-009

KAREN BOWEN
ATTORNEY AT LAW
WINSTON & STRAWN LLP
101 CALIFORNIA STREET
SAN FRANCISCO, CA 94111
R.06-04-009

DAVID BRANCHCOMB
BRANCHCOMB ASSOCIATES, LLC
9360 OAKTREE LANE
ORANGEVILLE, CA 95662
R.06-04-009

DONALD BROOKHYSER
ATTORNEY AT LAW
ALCANTAR & KAHL
120 MONTGOMERY STREET
Cogeneration Association of California
SAN FRANCISCO, CA 94104
R.06-04-009

ANDREW B. BROWN
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H STREET
SACRAMENTO, CA 95814
R.06-04-009

VERONIQUE BUGNION
POINT CARBON
205 SEVERN RIVER RD
SEVERNA PARK, MD 21146
R.06-04-009

DALLAS BURTRAW
1616 P STREET, NW
WASHINGTON, DC 20036
R.06-04-009

OLOF BYSTROM
DIRECTOR, WESTERN ENERGY
CAMBRIDGE ENERGY RESEARCH ASSOCIATES
555 CALIFORNIA STREET, 3RD FLOOR
SAN FRANCISCO, CA 94104
R.06-04-009

IAN CARTER
INTERNATIONAL EMISSIONS TRADING ASSN.
350 SPARKS STREET, STE. 809
OTTAWA, ON K1R 7S8
CANADA
R.06-04-009

SHERYL CARTER
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER STREET, 20TH FLOOR
SAN FRANCISCO, CA 94104
R.06-04-009

Theresa Cho
ATTORNEY AT LAW
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
R.06-04-009

JENNIFER CHAMBERLIN
STRATEGIC ENERGY
2633 WELLINGTON CT.
CLYDE, CA 94520
R.06-04-009

AUDREY CHANG
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER STREET, 20TH FLOOR
SAN FRANCISCO, CA 94104
R.06-04-009

DAREN CHAN
PO BOX 770000, MAIL CODE B9A
SAN FRANCISCO, CA 94177
R.06-04-009

BILL CHEN
CONSTELLATION NEWENERGY, INC.
2175 N. CALIFORNIA BLVD., SUITE 300
WALNUT CREEK, CA 94596
R.06-04-009

CLIFF CHEN
UNION OF CONCERNED SCIENTIST
2397 SHATTUCK AVENUE, STE 203
BERKELEY, CA 94704
R.06-04-009

BRIAN K. CHERRY
REGULATORY RELATIONS
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000 B10C
SAN FRANCISCO, CA 94177--0001
R.06-04-009

ALAN COMNES
WEST COAST POWER
3934 SE ASH STREET
PORTLAND, OR 97214
R.06-04-009

LISA A. COTTLE
ATTORNEY AT LAW
WINSTON & STRAWN, LLP
101 CALIFORNIA STREET, SUITE 3900
SAN FRANCISCO, CA 94111-5894
R.06-04-009

RICHARD COWART
REGULATORY ASSISTANCE PROJECT
50 STATE STREET, SUITE 3
MONTPELIER, VT 5602
R.06-04-009

BRIAN T. CRAGG
ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI RITCHIE & DAY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
R.06-04-009

SEBASTIEN CSAPO
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000
SAN FRANCISCO, CA 94177
R.06-04-009

THOMAS DARTON
PILOT POWER GROUP, INC.
9320 CHESAPEAKE DRIVE, SUITE 112
SAN DIEGO, CA 92123
R.06-04-009

KYLE L. DAVIS
PACIFICORP
825 NE MULTNOMAH,
PORTLAND, OR 97232
R.06-04-009

Matthew Deal
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
R.06-04-009

LISA DECARLO
STAFF COUNSEL
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET MS-14
SACRAMENTO, CA 95814
R.06-04-009

LISA DECKER
COUNSEL
CONSTELLATION ENERGY GROUP INC
111 MARKET PLACE, SUITE 500
BALTIMORE, MD 21202
R.06-04-009

PAUL DELANEY
AMERICAN UTILITY NETWORK (A.U.N.)
10705 DEER CANYON DRIVE
ALTA LOMA, CA 91737
R.06-04-009

DANIEL W. DOUGLASS
ATTORNEY AT LAW
DOUGLASS & LIDDELL
21700 OXNARD STREET, SUITE 1030
WOODLAND HILLS, CA 91367-8102
R.06-04-009

PIERRE H. DUVAIR
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS-41
SACRAMENTO, CA 95814
R.06-04-009

HARVEY EDER
PUBLIC SOLAR POWER COALITION
1218 12TH ST., 25
SANTA MONICA, CA 90401
R.06-04-009

SHAUN ELLIS
2183 UNION STREET
SAN FRANCISCO, CA 94123
R.06-04-009

SAEED FARROKHPAY
FEDERAL ENERGY REGULATORY COMMISSION
110 BLUE RAVINE RD., SUITE 107
FOLSOM, CA 95630
R.06-04-009

DIANE I. FELLMAN
ATTORNEY AT LAW
FPL ENERGY, LLC
234 VAN NESS AVENUE
SAN FRANCISCO, CA 94102
R.06-04-009

Julie A Fitch
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
EXECUTIVE DIVISION ROOM 5203
SAN FRANCISCO, CA 94102-3214
R.06-04-009

MICHEL PETER FLORIO
SENIOR ATTORNEY
THE UTILITY REFORM NETWORK (TURN)
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102
R.06-04-009

JONATHAN FORRESTER
PACIFIC GAS AND ELECTRIC COMPANY
245 MARKET STYREET, ROOM 1373A
SAN FRANCISCO, CA 94105
R.06-04-009

MATTHEW FREEDMAN
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102
R.06-04-009

NORMAN J. FURUTA
ATTORNEY AT LAW
DEPARTMENT OF THE NAVY
333 MARKET ST. 10TH FLOOR
SAN FRANCISCO, CA 94105-2195
R.06-04-009

JOHN GALLOWAY
UNION OF CONCERNED SCIENTISTS
2397 SHATTUCK AVENUE, SUITE 203
BERKELEY, CA 94704
R.06-04-009

JEDEDIAH J. GIBSON
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS LLP
2015 H STREET
SACRAMENTO, CA 95814
R.06-04-009

ANNETTE GILLIAM
SCE LAW DEPARTMENT
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
R.06-04-009

HAYLEY GOODSON
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102
R.06-04-009

MEG GOTTSTEIN
ADMINISTRATIVE LAW JUDGE
CALIF PUBLIC UTILITIES COMMISSION
PO BOX 210/21496 NATIONAL STREET
VOLCANO, CA 95689
R.06-04-009

JEFFREY P. GRAY
ATTORNEY AT LAW
DAVIS WRIGHT TREMAINE
505 MONTGOMERY STREET
SAN FRANCISCO, CA 94111-6533
R.06-04-009

KAREN GRIFFIN
EXECUTIVE OFFICE
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS 39
SACRAMENTO, CA 95814
R.06-04-009

ANN G. GRIMALDI
MCKENNA LONG & ALDRIDGE LLP
101 CALIFORNIA STREET, 41ST FLOOR
Center for Energy and Economic Development
SAN FRANCISCO, CA 94111
R.06-04-009

YVONNE GROSS
REGULATORY POLICY MANAGER
SEMPRA ENERGY
101 ASH STREET, HQ08C
SAN DIEGO, CA 92101
R.06-04-009

ERIC GUIDRY
WESTERN RESOURCE ADVOCATES
2260 BASELINE ROAD, SUITE 200
BOULDER, CO 80304
R.06-04-009

GEORGE HANSON
ASSISTANT GENERAL MANAGER
CITY OF CORONA
730 CORPORATION YARD WAY
CORONA, CA 92880
R.06-04-009

ARNO HARRIS
PO BOX 6903
SAN RAFAEL, CA 94903
R.06-04-009

HANK HARRIS
CORAL POWER, LLC
4445 EASTGATE MALL, SUITE 100
SAN DIEGO, CA 92121
R.06-04-009

AUDRA HARTMANN
LS POWER DEVELOPMENT
980 NINTH STREET, SUITE 1420
SACRAMENTO, CA 95814
R.06-04-009

KERRY HATTEVIK
MIRANT CORPORATION
696 WEST 10TH STREET
PITTSBURG, CA 94565
R.06-04-009

MARCEL HAWIGER
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102
R.06-04-009

TIM HEMIG
DIRECTOR
REGIONAL ENVIRONMENTAL BUSINESS
NRG ENER
4600 CARLSBAD BLVD.
CARLSBAD, CA 92008
R.06-04-009

DENISE HILL
DIRECTOR
4004 KRUSE WAY PLACE, SUITE 150
LAKE OSWEGO, OR 97035
R.06-04-009

NATALIE L HOCKEN
SENIOR COUNSEL
PACIFICORP
825 NE MULTNOMAH SUITE 1800
PORTLAND, OR 97232
R.06-04-009

ANDREW HOERNER
REDEFINING PROGRESS
1904 FRANKLIN STREET, 6TH FLOOR
OAKLAND, CA 94612
R.06-04-009

JUDITH IKLE
CALIFORNIA PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE RM 4012
SAN FRANCISCO, CA 94102
R.06-04-009

AKBAR JAZAYERI
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
R.06-04-009

CAROL JOLLY
PO BOX 585
CHESTERFIELD, MA 1012
R.06-04-009

BRIAN M. JONES
M.J. BRADLEY & ASSOCIATES, INC.
47 JUNCTION SQUARE DRIVE
CONCORD, MA 1742
R.06-04-009

MARC D. JOSEPH
ATTORNEY AT LAW
ADAMS BROADWELL JOSEPH & CARDOZO
601 GATEWAY BLVD., STE. 1000
SOUTH SAN FRANCISCO, CA 94080
R.06-04-009

EVELYN KAHL
ATTORNEY AT LAW
ALCANTAR & KAHL LLP
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CA 94104
R.06-04-009

JOSEPH KARP
ATTORNEY AT LAW
WINSTON & STRAWN LLP
101 CALIFORNIA STREET
SAN FRANCISCO, CA 94104-1513
R.06-04-009

CURTIS KEBLER
GOLDMAN, SACHS & CO.
2121 AVENUE OF THE STARS
LOS ANGELES, CA 90067
R.06-04-009

CAROLYN KEHREIN
ENERGY MANAGEMENT SERVICES
1505 DUNLAP COURT
DIXON, CA 95620-4208
R.06-04-009

STEVEN KELLY
INDEPENDENT ENERGY PRODUCERS ASSN
1215 K STREET, SUITE 900
SACRAMENTO, CA 95814-3947
R.06-04-009

GREGORY S.G. KLATT
DOUGLASS & LIDDELL
Alliance for Retail Energy Markets
21700 OXNARD STREET, SUITE 1030
WOODLAND, CA 91367-8102
R.06-04-009

GREGORY KOISER
CONSTELLATION NEW ENERGY, INC.
350 SOUTH GRAND AVENUE, SUITE 3800
LOS ANGELES, CA 90071
R.06-04-009

AVIS KOWALEWSKI
CALPINE CORPORATION
3875 HOPYARD ROAD, SUITE 345
PLEASANTON, CA 94588
R.06-04-009

LARS KVALE
CENTER FOR RESOURCE SOLUTIONS
PO BOX 39512
SAN FRANCISCO, CA 94129
R.06-04-009

Jonathan Lakritz
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5202
SAN FRANCISCO, CA 94102-3214
R.06-04-009

STEPHANIE LA SHAWN
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B8R
SAN FRANCISCO, CA 94105
R.06-04-009

SHAY LABRAY
MANAGER, REGULATORY
PACIFICORP
825 NE MULTNOMAH, SUITE 2000
PORTLAND, OR 97232
R.06-04-009

JOHN LAUN
APOGEE INTERACTIVE, INC.
1220 ROSECRANS ST., SUITE 308
SAN DIEGO, CA 92106
R.06-04-009

Diana L. Lee
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4300
SAN FRANCISCO, CA 94102-3214
R.06-04-009

JOHN W. LESLIE
ATTORNEY AT LAW
LUCE, FORWARD, HAMILTON & SCRIPPS, LLP
11988 EL CAMINO REAL, SUITE 200
SAN DIEGO, CA 92130
R.06-04-009

DONALD C. LIDDELL
DOUGLASS & LIDDELL
2928 2ND AVENUE
SAN DIEGO, CA 92103
R.06-04-009

KAREN LINDH
LINDH & ASSOCIATES
7909 WALERGA ROAD, NO. 112, PMB119
CMTA
ANTELOPE, CA 95843
R.06-04-009

GRACE LIVINGSTON-NUNLEY
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000 MAIL CODE B9A
SAN FRANCISCO, CA 94177
R.06-04-009

James Loewen
CALIF PUBLIC UTILITIES COMMISSION
320 WEST 4TH STREET SUITE 500
LOS ANGELES, CA 90013
R.06-04-009

BILL LOCKYER
STATE ATTORNEY GENERAL
STATE OF CALIFORNIA, DEPT OF JUSTICE
PO BOX 944255
SACRAMENTO, CA 94244-2550
R.06-04-009

LAD LORENZ
V.P. REGULATORY AFFAIRS
SOUTHERN CALIFORNIA GAS COMPANY
601 VAN NEW AVENUE, SUITE 2060
SAN FRANCISCO, CA 94102
R.06-04-009

BARRY LOVELL
BERRY PETROLEUM COMPANY
PO BOX 925
PO BOX 925
TAFT, CA 93268
R.06-04-009

ED LUCHA
PROJECT COORDINATOR
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MAIL CODE: B9A
PO BOX 770000
SAN FRANCISCO, CA 94177
R.06-04-009

FRANK LUCHETTI
NEVADA DIV. OF ENVIRONMENTAL
PROTECTION
901 S. STEWART ST., SUITE 4001
CARSON CITY, NV 89701
R.06-04-009

LYNELLE LUND
GENERAL COUNSEL
COMMERCE ENERGY, INC.
600 ANTON BLVD., STE 2000
COSTA MESA, CA 92626
R.06-04-009

MARY LYNCH
REGULATORY AND LEGISTLATIVE AFFAIRS
CONSTELLATION ENERGY COMMODITIES
GROUP
2377 GOLD MEADOW WAY, STE. 100
GOLD RIVER, CA 95670
R.06-04-009

JACLYN MARKS
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVE.
DIVISION OF STRATEGIC PLANNING
SAN FRANCISCO, CA 94102
R.06-04-009

CHRISTOPHER J. MAYER
MODESTO IRRIGATION DISTRICT
1231 11TH STREET
MODESTO, CA 95354
R.06-04-009

MICHAEL MAZUR
3 PHASES ELECTRICAL CONSULTING
2100 SEPULVEDA BLVD., SUITE 37
MANHATTAN BEACH, CA 90266
R.06-04-009

RICHARD MCCANN
M.CUBED
2655 PORTAGE BAY ROAD, SUITE 3
DAVIS, CA 95616
R.06-04-009

BARRY F MCCARTHY
ATTORNEY AT LAW
MCCARTHY & BERLIN, LLP
100 PARK CENTER PLAZA, SUITE 501
SAN JOSE, CA 95113
R.06-04-009

MIKE MCCORMICK
CALIFORNIA CLIMATE ACTION REGISTRY
515 S FLOWER ST. 1305
LOS ANGELES, CA 90071
R.06-04-009

KEITH R. MCCREA
ATTORNEY AT LAW
SUTHERLAND, ASBILL & BRENNAN
1275 PENNSYLVANIA AVENUE, NW
California Manufacturers & Technology
Association
WASHINGTON, DC 20004-2415
R.06-04-009

KAREN MCDONALD
POWEREX CORPORATION
666 BURRAND STREET
VANCOUVER, BC V6C 2X8
CANADA
R.06-04-009

JEN MCGRAW
CENTER FOR NEIGHBORHOOD
TECHNOLOGY
PO BOX 14322
SAN FRANCISCO, CA 94114
R.06-04-009

BRUCE MCLAUGHLIN
BRAUN & BLAISING P.C.
8066 GARRYANNA DRIVE
CITRUS HEIGHTS, CA 95610
R.06-04-009

BRIAN MCQUOWN
RELIANT ENERGY
7251 AMIGO ST., SUITE 120
LAS VEGAS, NV 89119
R.06-04-009

KAREN NORENE MILLS
ATTORNEY AT LAW
CALIFORNIA FARM BUREAU FEDERATION
2300 RIVER PLAZA DRIVE
SACRAMENTO, CA 95833
R.06-04-009

CYNTHIA K. MITCHELL
ECONOMIC CONSULTING INC.
530 COLGATE COURT
RENO, NV 89503
R.06-04-009

Lainie Motamedi
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5119
SAN FRANCISCO, CA 94102-3214
R.06-04-009

GREGG MORRIS
GREEN POWER INSTITUTE
2039 SHATTUCK AVE., SUITE 402
BERKELEY, CA 94704
R.06-04-009

STEVEN MOSS
FRANCISCO COMMUNITY POWER
COOPERATIVE
2325 3RD STREET, STE 344
SAN FRANCISCO, CA 94120
R.06-04-009

PHILLIP J. MULLER
SCD ENERGY SOLUTIONS
436 NOVA ALBION WAY
SAN RAFAEL, CA 94903
R.06-04-009

CLYDE S. MURLEY
INDEPENDENT CONSULTANT
600 SAN CARLOS AVENUE
ALBANY, CA 94706
R.06-04-009

SARA STECK MYERS
ATTORNEY AT LAW
LAW OFFICES OF SARA STECK MYERS
122 - 28TH AVENUE
SAN FRANCISCO, CA 94121
R.06-04-009

RICK NOGER
PRAXAIR PLAINFIELD, INC.
2711 CENTERVILLE ROAD, SUITE 400
WILMINGTON, DE 19808
R.06-04-009

TIMOTHY R. ODIL
MCKENNA LONG & ALDRIDGE LLP
1875 LAWRENCE STREET, SUITE 200
Center for Energy and Economic Development
DENVER, CO 80202
R.06-04-009

CARL PECHMAN
POWER ECONOMICS
901 CENTER STREET
SANTA CRUZ, CA 95060
R.06-04-009

ROGER PELOTE
WILLIAMS POWER COMPANY, INC.
12736 CALIFA STREET
VALLEY VILLAGE, CA 91607
R.06-04-009

JANIS C. PEPPER
CLEAN POWER MARKETS, INC.
418 BENVENUE AVENUE
LOS ALTOS, CA 94024
R.06-04-009

CARLA PETERMAN
CALIFORNIA PUBLIC UTILITIES
COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102
R.06-04-009

EDWARD G. POOLE
ATTORNEY AT LAW
ANDERSON & POOLE
601 CALIFORNIA STREET, SUITE 1300
SAN FRANCISCO, CA 94108-2818
R.06-04-009

KELLY POTTER
APS ENERGY SERVICES COMPANY, INC.
400 E. VAN BUREN STREET, SUITE 750
PHOENIX, AZ 85260
R.06-04-009

BRIAN POTTS
ONE SOUTH PINCKNEY STREET
MADISON, WI 53703
R.06-04-009

RASHA PRINCE
SOUTHERN CALIFORNIA GAS COMPANY
555 WEST 5TH STREET, ML 14D6
LOS ANGELES, CA 90013
R.06-04-009

BALWANT S. PUREWAL
DEPARTMENT OF WATER RESOURCES
3310 EL CAMINO AVE., LL-90
SACRAMENTO, CA 95821
R.06-04-009

ADRIAN PYE
ENERGY AMERICA, LLC
263 TRESSER BLVD.
STAMFORD, CT 6901
R.06-04-009

Kristin Ralff Douglas
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5119
SAN FRANCISCO, CA 94102-3214
R.06-04-009

STEVE RAHON
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP32C
SAN DIEGO, CA 92123-1548
R.06-04-009

TIFFANY RAU
POLICY AND COMMUNICATIONS MANAGER
CARSON HYDROGEN POWER PROJECT LLC
ONE WORLD TRADE CENTER, SUITE 1600
LONG BEACH, CA 90831-1600
R.06-04-009

JANILL RICHARDS
DEPUTY ATTORNEY GENERAL
CALIFORNIA ATTORNEY GENERAL'S OFFICE
1515 CLAY STREET, 20TH FLOOR
OAKLAND, CA 94702
R.06-04-009

Grant Rosenblum
STAFF COUNSEL
ELECTRICITY OVERSIGHT BOARD
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
R.06-04-009

THEODORE ROBERTS
SEMPRA ENERGY
101 ASH STREET, HQ 13D
SAN DIEGO, CA 92101-3017
R.06-04-009

JAMES ROSS
REGULATORY & COGENERATION SERVICES, INC.
500 CHESTERFIELD CENTER, SUITE 320
CHESTERFIELD, MO 63017
R.06-04-009

Nancy Ryan
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5217
SAN FRANCISCO, CA 94102-3214
R.06-04-009

SAM SADLER
OREGON DEPARTMENT OF ENERGY
625 NE MARION STREET
SALEM, OR 97301-3737
R.06-04-009

SOUMYA SASTRY
PO BOX 770000
SAN FRANCISCO, CA 94177
R.06-04-009

Don Schultz
CALIF PUBLIC UTILITIES COMMISSION
770 L STREET, SUITE 1050
RM. SCTO
SACRAMENTO, CA 95814
R.06-04-009

JANINE L. SCANCARELLI
FOLGER LEVIN & KAHN LLP
275 BATTERY STREET, 23RD FLOOR
SAN FRANCISCO, CA 94111
R.06-04-009

MICHAEL SCHEIBLE
DEPUTY EXECUTIVE OFFICER
CALIFORNIA AIR RESOURCES BOARD
1001 I STREET
SACRAMENTO, CA 95677
R.06-04-009

STEVEN S. SCHLEIMER
DIR. OF MARKET & REGULATORY AFFAIRS
CALPINE CORPORATION
3875 HOPYARD ROAD, SUITE 345
PO BOX 11749
PLEASANTON, CA 94588-1749
R.06-04-009

REED V. SCHMIDT
BARTLE WELLS ASSOCIATES
1889 ALCATRAZ AVENUE
California City-County Street Light Assoc.
BERKELEY, CA 94703-2714
R.06-04-009

LISA SCHWARTZ
SENIOR ANALYST
ORGEON PUBLIC UTILITY COMMISSION
PO BOX 2148
SALEM, OR 97308-2148
R.06-04-009

PAUL M. SEBY
MCKENNA LONG & ALDRIDGE LLP
1875 LAWRENCE STREET, SUITE 200
DENVER, CO 80202
R.06-04-009

KEVIN SIMONSEN
ENERGY MANAGEMENT SERVICES
646 EAST THIRD AVENUE
DURANGO, CO 81301
R.06-04-009

Donald R Smith
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4209
SAN FRANCISCO, CA 94102-3214
R.06-04-009

AIMEE M. SMITH
ATTORNEY AT LAW
SEMPRA ENERGY
101 ASH STREET HQ13
SAN DIEGO, CA 92101
R.06-04-009

GLORIA D. SMITH
ADAMS, BROADWELL, JOSEPH & CARDOZO
601 GATEWAY BLVD., SUITE 1000
SOUTH SAN FRANCISCO, CA 94080
R.06-04-009

RICHARD SMITH
MODESTO IRRIGATION DISTRICT
PO BOX 4060
MODESTO, CA 95352-4060
R.06-04-009

DARRELL SOYARS
MANAGER-RESOURCE
PERMITTING&STRATEGIC
6100 NEIL ROAD
RENO, NV 89520-0024
R.06-04-009

JAMES D. SQUERI
ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI RITCHIE & DAY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
R.06-04-009

SEEMA SRINIVASAN
ALCANTAR & KAHL
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CA 94104
R.06-04-009

ANNIE STANGE
ALCANTAR & KAHL
1300 SW FIFTH AVE., SUITE 1750
PORTLAND, OR 97210
R.06-04-009

MERIDETH TIRPAK STERKEL
CALIFORNIA PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
R.06-04-009

DON STONBERGER
APS ENERGY SERVICES COMPANY, INC.
400 E. VAN BUREN STREET, SUITE 750
PHOENIX, AZ 85004
R.06-04-009

NINA SUETAKE
THE UTILITY REFORM NETWORK
711 VAN NESS AVE., STE 350
SAN FRANCISCO, CA 94102
R.06-04-009

ADRIAN E. SULLIVAN
SEMPRA ENERGY
101 ASH STREET, HQ13D
SAN DIEGO, CA 92101
R.06-04-009

KENNY SWAIN
POWER ECONOMICS
901 CENTER STREET
SANTA CRUZ, CA 95060
R.06-04-009

Christine S Tam
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4209
SAN FRANCISCO, CA 94102-3214
R.06-04-009

KAREN TERRANOVA
ALCANTAR & KAHL
120 MONTGOMERY STREET SUITE 2200
SAN FRANCISCO, CA 94104
R.06-04-009

EDWARD J TIEDEMANN
KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD
400 CAPITOL MALL, 27TH FLOOR
SACRAMENTO, CA 95814-4416
R.06-04-009

SCOTT TOMASHEFSKY
REGULATORY AFFAIRS MANAGER
NORTHERN CALIFORNIA POWER AGENCY
180 CIRBY WAY
NORTHERN CALIFORNIA POWER AGENCY
ROSEVILLE, CA 95678
R.06-04-009

MARK C TREXLER
TREXLER CLIMATE+ENERGY SERVICES, INC.
529 SE GRAND AVE,M SUITE 300
PORTLAND, OR 97214-2232-2232
R.06-04-009

ANDREW J. VAN HORN
VAN HORN CONSULTING
12 LIND COURT
ORINDA, CA 94563
R.06-04-009

EDWARD VINE
LAWRENCE BERKELEY NATIIONAL LAB
BUILDING 90-4000
BERKELEY, CA 94720
R.06-04-009

SYMONE VONGDEUANE
SEMPRA ENERGY SOLUTIONS
101 ASH STREET, HQ09
SAN DIEGO, CA 92101-3017
R.06-04-009

DEVRA WANG
STAFF SCIENTIST
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER STREET, 20TH FLOOR
SAN FRANCISCO, CA 94104
R.06-04-009

CHRISTOPHER J. WARNER
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
SAN FRANCISCO, CA 94120
R.06-04-009

JOY WARREN
MODESTO IRRIGATION DISTRICT
1231 11TH STREET
MODESTO, CA 95354
R.06-04-009

LISA WEINZIMER
CALIFORNIA ENERGY REPORTER
PLATTS
695 NINTH AVENUE, NO. 2
SAN FRANCISCO, CA 94118
R.06-04-009

ANDREA WELLER
DIRECTOR
STRATEGIC ENERGY LLC
3130 D BALFOUR ROAD, SUITE 290
BRENTWOOD, CA 94513
R.06-04-009

GREGGORY L. WHEATLAND
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS
2015 H STREET
SACRAMENTO, CA 95814
R.06-04-009

JOSEPH F. WIEDMAN
GOODIN MACBRIDE SQUERI RITCHIE & DAY,LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
R.06-04-009

VALERIE J. WINN
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B9A
SAN FRANCISCO, CA 94105
R.06-04-009

RYAN WISER
BERKELEY LAB
ONE CYCLOTRON ROAD
BERKELEY, CA 94720
R.06-04-009

ELLEN WOLFE
RESERO CONSULTING
9289 SHADOW BROOK PL.
GRANITE BAY, CA 95746
R.06-04-009

CATHY S. WOOLLUMS
MIDAMERICAN ENERGY HOLDINGS COMPANY
106 EAST SECOND STREET
DAVENPORT, IA 52801
R.06-04-009

LINDA WRAZEN
SEMPRA ENERGY REGULATORY AFFAIRS
101 ASH STREET, HQ16C
SAN DIEGO, CA 92101
R.06-04-009

E. J. WRIGHT
OCCIDENTIAL ENERGY MARKETING, INC.
5 GREENWAY PLAZA, SUITE 110
HOUSTON, TX 77046
R.06-04-009

LEGAL & REGULATORY DEPARTMENT
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
R.06-04-009

CALIFORNIA ENERGY MARKETS
517-B POTRERO AVE.
SAN FRANCISCO, CA 94110-1431
R.06-04-009

MRW & ASSOCIATES, INC.
1999 HARRISON STREET, STE 1440
OAKLAND, CA 94612-3517
R.06-04-009